

## **Supplemental Privacy Provision – Southland Employees, Job Candidates and Applicants**

**Last Updated and Effective Date: January 1, 2023**

This Supplemental Provision (this "Supplement") supplements the information contained in the Southland Industries ("Southland") Privacy Policy (the "Privacy Policy") and applies to those individuals who are candidates/applicants for positions or are currently employed with Southland, who have rights as consumers under the California Consumer Protection Act ("CCPA", as amended by the California Privacy Rights Act (together, the "CPRA")) and other applicable state privacy regulations; these individuals are referred to herein as "you," "your," "candidates/applicants," or "employees." The purpose of this Addendum is to inform and provide additional information to candidates/job applicants in certain jurisdictions about the categories of Personal Information we obtain and receive when you apply for a position with us, and the purposes for which we use such Personal Information, as well as the information we retain for employment purposes. Unless otherwise defined in the Privacy Policy, any terms used and not otherwise defined in this Addendum have the meaning used in the CPRA. As used in this Addendum:

- "Southland," "Company" "ours" "our" "us" and "we" means Southland Industries and its subsidiaries and affiliates.
- "Personal Information" is any information that:
  - o Identifies or can be used to identify you;
  - o Relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you or your household;
  - o Can be used to authenticate you or provide access to your information; or
  - o Relates to you and that might be Sensitive Personal Information, as defined by the CPRA.
- o Personal Information does not include publicly available information or deidentified or aggregated consumer information.
- o Personal Information will not include the Individual's business title, business address and contact information when used or disclosed for the purposes of reasonable business communication.

### Notice at Collection and Summary of Information Handling Practices

The chart below describes the categories of Personal Information we collect and the handling practices regarding the Personal Information of candidates/applicants. In addition, during the past 12 months, we have collected and used the categories of Personal Information specified in the chart below for the business purposes stated therein (depending on the nature of your interactions with us). We will retain the categories of Personal Information specified below as stated in the Data Retention Section.

<b><u>Categories of Personal Information We Collect for Applicants</u></b>	<b><u>Purpose</u></b>
Personal Identifiers – such as your full name, home address, personal phone numbers, and email address.	<ul style="list-style-type: none"> <li>- Recruitment purposes, such as to process your application and to communicate with you and/or recruiters or employment/staffing agencies about your job or assignment application and other recruitment opportunities.</li> <li>- To fulfill our compliance or legal obligations or as otherwise permitted by applicable laws, rules and regulations (collectively "laws").</li> </ul>
Professional, Employment, and Educational Information – such as information about your education, employment history, resumes, curriculum vitae, cover letter, and professional licenses and certifications.	<ul style="list-style-type: none"> <li>- Recruitment purposes, such as processing your application and assessing your application for a role or assignment with Southland.</li> </ul>
Characteristics of protected classifications under California or Federal Law, also considered Sensitive Personal Information – such as such as your, gender, race, ethnicity, disability status or sexual orientation or gender identity.	<ul style="list-style-type: none"> <li>- To determine the diversity make-up of Southland's applicant pool.</li> <li>- To fulfill our compliance or legal obligations or as otherwise permitted by applicable laws.</li> </ul>
Internet or other electronic network activity information related to your use of Southland's Career website, including – such usage data, browsing history, search history, browser type, operating system name and version device type and information regarding your interaction with an internet website application.	<ul style="list-style-type: none"> <li>- To review statistical information about use of the website/services in order to improve their design and functionality, to understand how they are used, and to assist us with resolving questions about the website/services.</li> <li>- To manage our business, such as for data analysis, audits, information security, ensuring that the website/services function properly and otherwise administering and improving them, identifying usage trends, and expanding our business activities.</li> </ul>

We may provide you with the option to limit or restrict the disclosure of certain of your Personal Information. We will honor those choices, where provided.

We do not have actual knowledge of any collection, use, sale, or sharing of Personal Information of individuals under 16 years of age.

## Corporate Privacy Policy

1. All Personal Information will be released internally only on a need-to-know basis. In the course of normal and reasonable business practices it is the policy of the Company to grant designated Company representatives (the “Staff”) access to Personal Information files. This access will not exceed that which is necessary to accomplish the specific business function of the Staff nor the purpose for which the information was originally collected.
2. The Company and its employees responsible for collecting, utilizing, and disposing of Personal Information (the “Staff”) will at all times respect the confidentiality of the Personal Information placed in its care. The Company will endeavor to ensure that the policies affecting the collection, storage and disclosure of Personal Information reflect the confidential nature of the information.

## Purposes for which Personal Information is Collected

3. Personal Information will be collected, used and disclosed for purposes pertaining to the Individual's employment relationship with the Company, including but not limited to the administration of employee hiring, performance reviews, the administration of employee payroll and benefits, processing of employee benefit claims, and for the purpose of complying with all applicable labor and employment regulations.
4. Personal Information will only be used for the stated purpose(s) for which it was originally collected. The purposes for which Personal Information is being collected will be identified orally or in writing to the Individual before it is collected.
5. The Company may use Personal Information for a purpose other than the originally stated purpose where the new purpose is required by law or where the Company has notified the affected Individual.
6. Additional Uses: We may also use all of the Personal Information noted above as we believe necessary:
  - To authenticate you so that you may make your privacy policy choices.
  - To fulfill our compliance or legal obligations or as otherwise permitted by applicable laws.
  - To communicate with you and/or recruiters or employment/staffing agencies about your application process, including responding to your inquires and notifying you of your application status, all on the basis of our legitimate interest in the continuation of or processing your application for employment or assignment with us.
  - To facilitate your future or current employment with Southland, including but not limited to, any processing of payroll, benefits, or any other ongoing employment purposes.

### Knowledge and Consent

7. Knowledge and consent are required from the affected Individual for the collection, use and disclosure of all Personal Information subject to exceptions noted elsewhere in the Privacy Policy statement.
8. Consent will not be obtained through deception or misrepresentation.
9. Any use or disclosure of Personal Information will be within the reasonable expectations of the Individual.
10. Subject to legal and contractual obligations, an Individual may withdraw their consent upon reasonable notice.

### Legislation and Regulation

11. Where the Company has Individuals living and working in different jurisdictions the specific rights and obligations of Individuals may vary between jurisdictions.
12. If any term, covenant, condition or provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid, void or unenforceable, it is the intent of this Privacy Policy that the scope of the rights and obligations of the Privacy Policy be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Privacy Policy statement will in no way be affected, impaired or invalidated as a result.
13. If Company creates, acquires, is acquired by, or otherwise becomes affiliated with another organization, said organization shall be given a reasonable time-period to comply with any applicable privacy regulations.
14. To the extent that an Individual employed by the Company works or resides outside of a jurisdiction subject to applicable privacy regulations, such Individuals may not be entitled to all of the rights conferred by this Privacy Policy or privacy regulations in other jurisdictions.

### Collection of Personal Information

15. The type and amount of Personal Information collected by the Company will not be collected maliciously or without a reasonable business purpose.
16. Personal Information will be collected using fair and lawful means.

17. Information provided by you to us directly or indirectly may be used and/or kept by us as part of the application or employment process. This may include information you have provided to service providers and contractors who collect information in order to provide services to us.
18. We may collect information about you from third parties, such as past employers, employment agencies, recruiters, and references.

#### Rights of Access, Correction, and Deletion

19. The Company will make reasonable efforts to ensure that Personal Information is at all times complete and accurate for its stated purpose.
20. An Individual may apply for access to their Personal Information by submitting a request in writing along with adequate proof of identity to an authorized personnel officer. The Individual will be provided with a summary of all available Personal Information collected by Company that is not subject to restriction as described in this Privacy Policy or per applicable laws and regulations.
21. Where an Individual suspects that an error exists in their Personal Information, the Individual may submit a request in writing for correction. This request should include any relevant information substantiating the error and should describe the correction to be made. The Company will make all reasonable efforts to address any request for correction.
22. Where the Individual successfully demonstrates an error in their Personal Information, the Company will make appropriate corrections.
23. Where a request for correction is not successful, the details and substantiating evidence of the request will be recorded and retained by the Company.
24. The Company will take reasonable steps to respond promptly to any valid request for disclosure and correction made by an Individual to ensure the continued accuracy of Personal Information.
25. In some instances, the Company may be required to limit access to Personal Information because of statutory or regulatory requirements. In all instances however, the Company will make all reasonable efforts to comply with the Individual's request for access, correction, or deletion to the extent of what is allowed by statute or regulation.
26. The Company may refuse access to portions of the Personal Information of an Individual where it is found to contain Personal Information pertaining to another Individual or where an Individual's identity cannot be successfully validated.

27. Individuals have the right to request that any Personal Information collected by the Company be deleted (subject to reasonable limitations, stated herein, or otherwise). However, if the individual cannot prove the information is incorrect, the company is not required to change or delete the information. Any Personal Information necessary to facilitate the continued employment of the Individual, or that which is required to be kept under any applicable law, will be retained for any necessary period of time.
28. Individuals have the right to opt-out of the sale/sharing of Personal Information, the right to limit the disclosure of sensitive Personal Information, and the right to opt-out of automated decision-making, where applicable, and subject to any applicable law.

#### Use and Disclosure of Personal Information

29. The Company and the Staff will keep confidential all Personal Information in its control except where one or more of the following conditions apply:
  - a. where the Individual who is the subject of disclosure has provided written consent;
  - b. where the disclosure is in accord with the purposes for which the Personal Information was originally collected;
  - c. where the disclosure is for the purpose of providing employment references to prospective employers and where the Personal Information disclosed is limited to information considered reasonably necessary for the purpose of providing employment references;
  - d. where the Company is permitted or required to do so by applicable law;
  - e. where the disclosure is directed to employment benefit providers and where the purpose of the disclosure is in accord with the purposes for which the Personal Information was originally collected;
  - f. where the disclosure is required by authorized government representatives who are acting to enforce any federal or state law or carrying out an investigation relating to the enforcement of any federal or state law or gathering information for the purpose of enforcing any federal or state law;
  - g. where the Company is required to comply with valid court orders, warrants or subpoenas or other valid legal processes; and
  - h. in an emergency to protect the physical safety of any person or group of persons.

#### Retention and Disposal of Personal Information

30. All Personal Information collected by the Company in compliance with this Privacy Policy are business records of the Company.
31. Any Personal Information collected by the Company will be retained by the Company during the period of active employment of the Individual as well as during the post-employment period only as long as the Personal Information is required to serve its original purpose or as directed by applicable legislation or regulation.

32. In certain circumstances, Personal Information may be kept beyond an Individual's period of employment with the Company or beyond the application/interviewing process for employment with the Company, in order to consider the Individual for future employment opportunities, or to comply with state and federal regulations.
33. Personal Information that is no longer needed for its stated purpose may be destroyed, erased, or made anonymous.
34. The Company will educate and inform all Staff regarding the Privacy Policy and related procedures and on the importance of confidentiality of Personal Information and will monitor compliance with the Privacy Policy and may observe and investigate the information management practices of all Staff having care of Personal Information.

To Exercise Your Rights, Submit a Request To:

Southland Industries  
12131 Western Avenue  
Garden Grove, CA 92841

[Privacy@southlandind.com](mailto:Privacy@southlandind.com)